

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiffs,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

- - - - -

VOLUME I OF THE DEPOSITION OF

W. A. SAUNDERS, produced as a witness on behalf of
the Plaintiffs in the above styled and numbered
cause, taken on the 23rd day of October, 2006, in
the City of West Siloam Springs, County of Delaware,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

A P P E A R A N C E S

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FOR THE PLAINTIFFS:

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-and-
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1	I N D E X	
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3	W I T N E S S	P A G E
4	W. A. SAUNDERS	
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11:57AM

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1 (Whereupon, the deposition began at
2 12:05 p.m.)

3 W. A. SAUNDERS
4 having first been duly sworn to testify the truth,
5 the whole truth and nothing but the truth, testified
6 as follows:

7 DIRECT EXAMINATION

8 BY MR. GARREN:

9 Q Mr. Saunders, please state your full name to
10 the court.

12:05PM

11 A Woodrow Alfred Saunders, Junior.

12 Q I've handed you what's been marked as
13 Deposition Exhibit No. 3. I'll represent to you
14 that's a copy of the subpoena that was served. Do
15 you remember seeing this document?

12:05PM

16 A I have.

17 Q What I would like to do is go through the list
18 for the attachments and identify what you know to be
19 contained within the documents that you provided to
20 us under that subpoena.

12:06PM

21 MR. McDANIEL: And in anticipation of him
22 giving this answer, just so the Record is clear, I
23 believe we have an agreement that documents that Mr.
24 Saunders has produced, Peterson identified certain
25 of those documents as being confidential for

12:06PM

Page 90

1 Q Yeah. Looking still at this Page 16206, do
2 you know what the year was for this application?

3 A It says received 2004.

4 Q Well, that's the stamp from the ODAFF, State
5 Department of Agriculture; correct?

02:11PM

6 A Right.

7 Q But the date on the side here in the left-hand
8 column says 3-23. It doesn't have a year, does it?

9 A It would be '04.

10 Q And you know that to be '04?

02:11PM

11 A Yeah. I mean that's before we had field
12 management. I'm guessing at that.

13 Q Okay. Who prepared a field measurement for
14 you?

15 A ODAFF apparently.

02:11PM

16 Q When you say ODAFF, do you mean like NRCS or
17 Department of Ag?

18 A I mean Department of Ag. That's who made
19 this, wasn't it? That's who drew up my waste
20 management plan and measured the fields out or
21 showed the fields out.

02:12PM

22 Q Well --

23 A Unless I'm mistaken, and I've made two or
24 three mistakes today.

25 Q Let's look back at your waste management plan.

02:12PM